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December 13, 2005

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DEC 13 2005

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room 8B201  
Washington, DC 20554

Federal Communications Commission  
Office of Secretary

Re: Federal-State Joint Board on Universal Service  
Universal Service Contribution Methodology Second Further Notice  
CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116  
and 98-170  
NSD File No. L-00-72  
Notice of Oral Ex Parte Communications

Dear Ms. Dortch:

I am writing this letter to report that, on December 12, 2005, Alexandra Wilson, Vice President, Public Policy of Cox Enterprises, Inc. and the undersigned, both representing Cox Communications, Inc., met to discuss the above-referenced proceeding with Michelle Carey, legal advisor to Chairman Martin and with Narda Jones, Chief of the Telecommunications Access and Policy Division of the Wireline Competition Bureau, Cathy Carpino, Deputy Chief of the division, Carol Pomponio and Greg Guice of the division, James Lande and James Eisner of the Industry Analysis and Technology Division of the Wireline Competition Bureau and Amy Bender of the Wireline Competition Bureau.

During the meetings, we discussed the issues raised in this proceeding, including the desirability of adopting a numbers-based system, mechanisms for implementing such a system, the allocation of contributions between residential and business services and contributions for high-capacity services sold to business customers. Cox's positions on these issues were described on a handout provided to the Commission participants. A copy of the handout is attached to this notice.

In accordance with the requirements of Section 1.1206 of the Commission's rules, an original and one copy of this notice are being filed in CC Docket No. 96-45 and two copies of this notice are being filed in the other above-referenced dockets on the business day following the meetings and a copies of this notice are being provided to the Commission participants in the meetings.

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Please inform me if any questions should arise in connection with this notice.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J.G. Harrington', with a stylized flourish at the end.

J.G. Harrington

Counsel to Cox Communications, Inc.

JGH/vll

Attachment

cc (w/o att.): Michelle Carey  
Narda Jones  
Cathy Carpino  
Carol Pomponio  
Greg Guice  
James Lande  
James Eisner  
Amy Bender



COX COMMUNICATIONS, INC.  
UNIVERSAL SERVICE CONTRIBUTION METHODOLOGY  
CC DOCKET NOS. 96-45 ET AL.

➤ **The Commission Should Adopt a Numbers-Based Contribution System**

A numbers-based system will ensure that all providers contribute appropriately to the support of universal service. It also equitably distributes the burden in a way that correlates to the benefits carriers and customers obtain from the public switched telephone network, which the current system does not do.

Any numbers-based system should require contributions based only on numbers used by a carrier, which requires the Commission to account for numbers ported in and ported out in any calculations.

➤ **The Commission Should Maintain the Current Balance of Contributions from Consumer and Business Services**

However the Commission modifies its rules, it should ensure that consumer services do not contribute more than their current share of the universal service fund. To achieve this goal, the Commission may need to impose a larger per-number contribution on business services than on residential services.

The Commission also should require contributions from high-capacity business services, as it does today, but should be careful to ensure that contribution levels do not create disincentives to purchase services at higher capacities.